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Attorneys for Defendant
SCOTT SHAW

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SCOTT SHAW,

Defendant.

No. CR 22-00105-BLF

**DEFENDANT SCOTT SHAW'S
NOTICE OF COMPLIANCE WITH FED.
R. CRIM. P. 16(b)(1)(C) – DISCLOSURE
OF EXPERT WITNESS**

Defendant Scott Shaw hereby provides notice that he has complied with the requirements of Federal Rule of Criminal Procedure 16(b)(1)(C), as amended, and notified the government that he intends to call as an expert witness in his case-in-chief and/or in rebuttal Dr. Brett R. DeGooyer. The defense has provided the government with a written signed report from Dr.

DeGooyer, as well as his current *curriculum vitae* and information regarding his publications and prior testimony, as required by the Rule.

The defense is well aware that this disclosure is untimely under the Court's scheduling Order in this matter, ECF 28, which requires that such disclosure be made by January 9, 2023. The defense is prepared to establish both the materiality of Dr. DeGooyer's testimony and the due diligence undertaken by the defense to timely secure an expert witness in this matter at any proceeding at which it might be required.

Dated: March 10, 2023

/s/ Sam J. Polverino

Sam J. Polverino

Dated: March 10, 2023

/s/ Jeremy D. Blank

Jeremy D. Blank

Attorneys for Defendant

SCOTT SHAW